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## MEMO ENDORSED

January 11, 2023

By Ecf : (Doc # 11)

Hon. Edgardo Ramos  
United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: USA v. Obioma Iwobi  
22 Cr 00652 (ER)

Dear Judge:

The undersigned represents Mr. Iwobi, the defendant in the above referenced case and respectfully submits this letter in accordance with your honor's individual practices and seeking a modification of the Order of defendant's bail condition of release. The modification sought is specifically with the conditions contained under paragraph (7) (f) of the relevant Order. A copy of which is attached herein.

The current Order restricts the defendant's travel to the "SDNY, EDNY, EDTX and points in between for travel to and from court". The defendant is seeking an expansion to include the Northern and Southern Districts of Texas and the Western and Eastern Districts of Oklahoma.

The reason for the expansion is that the defendant resides in the Eastern District of Texas, along the border of the Northern District of Texas, however most of his daily activities, including but not limited to family, children and work occur primarily in the Northern District of Texas which is not included in the Order. Further based upon the defendant's work/business he is necessitated to go in and out of the remaining districts, including to obtain, service, and or ship the equipment that is sold by his trucking equipment business.

I have discussed the matter with the assigned A.U.S.A., Mr. Josiah Pertz, and he has no objection to the relief requested herein.

For the foregoing reasons, the defendant respectfully pleads that his bail conditions be modified allowing him to travel in and out of the Northern and Southern

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Districts of Texas and the Western and Eastern Districts of Oklahoma, upon the approval of said travel by Pre-Trial Services.

Thank you for your consideration in this matter.

Respectfully submitted,  
O'keke & Associates, PC.

/s/

Patrick O'keke, Esq. (PO-2861)

Cc.

AUSA Josiah Pertz (By Ecf)  
PTS Officer Lea Harmon (Ecf /Email : Lea\_Harmon@nyspt.uscourts.gov)

Defendant's application is granted. Mr. Iwobi bail conditions are allowed to travel to NDTX, SDTX, WDOK, and EDOK upon the approval by Pre-trial Services.

SO ORDERED.



Edgardo Ramos, U.S.D.J.

Dated: 1/27/2023

New York, New York